

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF NEW YORK

PATRICK GUILLORY

753 JAMES STREET. APT. NO 1129

SYRACUSE, NEW YORK 13203

(315) 254-1149

Plaintiff,

CASE NO: _____

5:21-CV-023

DNH / ML

CHIEF JUDGE ANDREW BAXTER

DATE: May 28, 2021

Vs.

BOOST MOBILE

500 BUTTERNUT STREET

SYRACUSE, NEW YORK 13208

(315) 847-4571

Defendant,

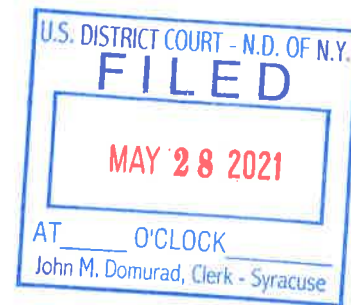
BOOST MOBILE

308 SOUTH SALINA STREET

SYRACUSE, NEW YORK 13202

(315) 897-8788

Defendant,



Section
1983

NATALIA DOE

STORE MANAGER

BOOST MOBILE

500 BUTTERNUT STREET

SYRACUSE, NEW YORK 13208

(315) 847-4571

Defendant,

COMPLAINT

1. This Court has jurisdiction over the Plaintiff and the above referenced Defendants on the grounds that the Plaintiff and the aforesaid Defendants reside within Onondaga County.
2. Diversity of Jurisdiction apply in this matter on the subsequent ground that I bought my phone in the State of Texas (crossing State Lines) whereby the Defendants defrauded me and others (this shall be considered a class action lawsuit) out of over \$80,000 in damages.
3. Simply, Defendants Boost and Natalia Doe continues to defraud customers within an insurance scam across State Lines.
4. In fact, I purchased my phone last week (phone number (315) 254-1149) and I was informed by the said Defendants that I would be placed on an unlimited plan. Yet, one week into the agreement, I was informed that my data would be reduced. This is fraud. Switch and bait. I have absolutely no access to the internet...I cannot google anything...and I cannot even use my phone across State Lines. I have been defrauded.
5. I paid over \$200 for this phone (315) 254-1149 to add to two existing lines (409) 363-7248 and (315) 383-5350which makes three (3) lines.
6. I have insurance on all three (3) said phones for \$7.00 a month.

7. I am on the unlimited plan.

- 8.** However, the unlimited plan is a fraud across state lines on the grounds that I just paid these bogus Defendants one (1) ago which Defendant Natalia Doe and / or her Coworker asserted that my services was unlimited with the said three (3) lines.
- 9.** Moreover, the Defendant Natalia Doe and Defendant Boost fail to inform customers that there would be a \$175 fee if you lose your phone to get a replacement notwithstanding the fact that you are paying a \$7.00 fee per month for insurance. It is a scam. I am not having it.
- 10.** Currently, I am unable to Google or contact my farther, whereby I just lost my mother last week. I cannot Google shit...because I got scammed by Defendants Boost and Natalia Doe.
- 11.** With the above in mind, if the Defendants think that I will be paying \$100 for **unlimited services**....then subsequently refuse to allow me to use their services across State Lines to bury my mother...they picked the right one....this is fraud.
- 12.** I cannot Google my dad's address...I cannot do anything on my phone at all....just make phone calls due to the Defendants' fraudulent practices across State Lines.
- 13.** I have been scammed and defrauded by the said Defendants and the same Defendants have been scamming other customers with their bait and switch practices across State Lines which makes this matter Federal.
- 14.** The Defendants have been placed on actual and constructive notice. I am not having it....the Defendants want to play me out of \$75,000 in damages along with others....they can pay their lawyers to Defend this action at \$500 an hour.
- 15.** Whether it is the Supreme Court, Federal Court, or City Court....if they want to screw me...I screw back.
- 16.** How in the hell I just paid my phone bill last week and I am out of data on an unlimited plan....please....I am not that nigga. Fax. I was a Jury trial.

This is a verified affidavit under the penalty of perjury.

RELIEF SOUGHT

I Demand \$600,000 in actual damages.

I Demand \$ 400,000 in punitive damages.

I Demand an investigation by the Federal Trade Commission contra the
aforementioned Defendants for Corporate Fraud.

I Demand that is case also be referred to the Attorney General for the State of
New York for Corporate Fraud.

Shalom,



Patrick Guillory

Note: I was informed by an employee at Boost on Salina that if I wanted to report
my phones lost (even though I have insurance on all my phones lines... my phone
(315) 254-1149 will be cut off) this is a racket. I am not freaking having it...I will
have the Defendants in Federal Court...the Supreme Court and City Court for
years. They picked the right freaking one to screw over...facts.